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# ***OAR Box 1214***

*Prepped by Ollie Stewart*

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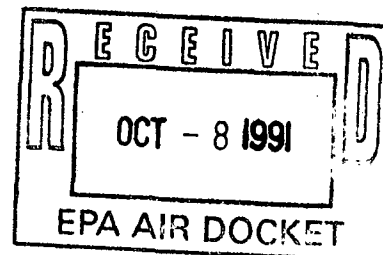
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## PLACID REFINING COMPANY

1940 HIGHWAY #1 NORTH • PORT ALLEN, LOUISIANA 70767 • PHONE: (504) 387-0278

October 4, 1991



Mr. William K. Reilly  
Administrator  
United States Environmental Protection Agency  
401 Main Street, S.W.  
Washington, D. C. 20460

RE: USE OF MMT IN UNLEADED GASOLINE

Dear Sir:

Placid Refining Company has reviewed the data supplied by Ethyl Corporation for the additive HI TEC 3000 containing MMT (manganese based antiknock). Based on the octane response of 0.8(R+M/2) with the addition of 0.03g MN/gal., our analyses confirms a reduction in reformer severity resulting in a decreased aromatics content of 1.5 percent in the total unleaded pool.

In view of the pending legislation to specify environmentally acceptable gasolines, we feel that octane replacement will be critical. For that reason, Placid Refining Company supports the waiver to permit the use of MMT in unleaded gasoline.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary B. Fuller".

Gary B. Fuller  
Manager of Planning

GBF/sh025

cc: File/Chron. File